

# EXHIBIT N

Vladimir Iakovlev, M.D.

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
3                   AT CHARLESTON

4  
5   IN RE: ETHICON, INC.,                   Master File No.  
6   PELVIC REPAIR SYSTEM PRODUCTS       2:12-MD-02327  
7   LIABILITY LITIGATION                 MDL 2327

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9   THIS DOCUMENT RELATES TO CASE  
10  CONSOLIDATION:  
11  Terreski Mullins, et al., v.  
12  Ethicon, Inc., et al.  
13  Case No. 2:12-CV-02952

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17                   DEPOSITION OF

18                   VLADIMIR IAKOVLEV, M.D.

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20                   \* \* \* \*

21                   HIGHLY CONFIDENTIAL PORTION

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24                   September 14, 2015

25                   9:00 a.m. - 5:05 p.m.

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1 intentionally oxidized polypropylene by exposing it  
2 to some chemical solution?

3 MR. ORENT: Objection.

4 THE WITNESS: Yes, he did.

5 BY MR. THOMAS:

6 Q. Did you ask him to have that mesh  
7 so that you could determine whether this  
8 intentionally oxidized polypropylene absorbed  
9 stain?

10 MR. ORENT: Objection.

11 THE WITNESS: No.

12 BY MR. THOMAS:

13 Q. Why not?

14 MR. ORENT: Objection.

15 THE WITNESS: Because I'm doing my own  
16 experiment and I believe I need to keep it for at  
17 least a year and a half.

18 BY MR. THOMAS:

19 Q. Did you discuss with Dr. Guelcher  
20 the scope of his experiment?

21 MR. ORENT: Objection. At this point,  
22 Counsel, I think you're getting into -- I think you  
23 need to clarify whether your questions are in the  
24 context of litigation or research.

25 To the extent it's in litigation it's

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1 covered by privilege and I would instruct the  
2 witness not to answer under the rules. But to the  
3 extent that you're discussing research, I think  
4 that's fair game to discuss.

5 BY MR. THOMAS:

6 Q. Okay. From a research  
7 perspective, did you have any discussions with Dr.  
8 Guelcher about his experiment?

9 A. It's work in progress so it's  
10 privileged to researchers, I guess, at this point.

11 Q. Are you going to assert a  
12 privilege for your research?

13 A. For research information, yes.

14 Q. Okay. And you asserted a  
15 litigation privilege, which I don't think is  
16 appropriate -- I'm not arguing with you. You said  
17 there's no research privilege. Now he's trying to  
18 assert a research privilege?

19 MR. ORENT: No, what I said was in  
20 terms of legal -- in terms of legal privileges that  
21 I can, that I have, that I have an attorney-client --  
22 excuse me, a attorney work product under the Rule  
23 26.

24 Rule 26 specifically allows for expert  
25 witnesses to consult with one another under the

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1 CERTIFICATE OF REPORTER

2 CANADA )

3 PROVINCE OF ONTARIO )

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5 I, Judith M. Caputo, the officer before whom the  
6 foregoing deposition was taken, do hereby certify  
7 that the witness whose testimony appears in the  
8 foregoing deposition was duly sworn by me; that the  
9 testimony of said witness was taken by me in  
10 shorthand, using Computer Aided Realtime, to the  
11 best of my ability and thereafter reduced to  
12 written format under my direction; that I am  
13 neither counsel for, related to, nor employed by  
14 any of the parties to the action in which the  
15 deposition was taken, and further that I am not  
16 related or any employee of any attorney or counsel  
17 employed by the parties thereto, nor financially or  
18 otherwise interested in the outcome of the action.

19

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22 Judith M. Caputo, RPR, CSR, CRR

23

24 Commissioner for taking

25 Oaths in the Province of Ontario